

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 11:32:36 AM
Last Modified: Tuesday, January 30, 2018 11:33:41 AM
Time Spent: 00:01:05
IP Address: 12.9.23.93

Page 1

Q1 First Name (Optional)

Steve

Q2 Last Name (Optional)

Meister

Q3 Organization (Optional)

Meister Law Offices

Q4 Title (Optional)

Criminal Defense Lawyer

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Respondent skipped this question

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 2:12:03 PM
Last Modified: Tuesday, January 30, 2018 2:18:51 PM
Time Spent: 00:06:48
IP Address: 159.83.136.3

Page 1

Q1 First Name (Optional)

Robert

Q2 Last Name (Optional)

Vaughn

Q3 Organization (Optional)

RLCCA/RLC

Q4 Title (Optional)

Southwest Regional Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Will this process ever be simplified are other produce or herb farmers subjected to the same procedures and regulations?

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 2:24:45 PM
Last Modified: Tuesday, January 30, 2018 2:35:21 PM
Time Spent: 00:10:36
IP Address: 74.123.254.4

Page 1

Q1 First Name (Optional)

Mic

Q2 Last Name (Optional)

Steinmann

Q3 Organization (Optional)

City of Greenfield

Q4 Title (Optional)

Community Services Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Currently all cannabis activities are either an A or M license. Until July 1, any type of licensee can conduct business with any other type of licensee. Will this be extended? The issue of concern is that at the cultivation and manufacturing level there is really no difference between adult-use and medicinal except for the track and trace and restriction that at the retail level medicinal cannabis can be sold only from a supply chain that is also restricted to medicinal cultivation and manufacturing. In the future this will become very problematic. I anticipate that most medicinal sales will actually be through an adult-use licensee (because there is no incentive for consumers to go through the time and expense necessary to get a physician's recommendation and a medical card). In the future I foresee very few medicinal patients actually having a recommendation or medical card. If a cultivator or manufacturer only has a M license, in the very near future there will be no market for their product. Distinguishing between medicinal and adult-use through the supply chain makes no business or practical sense. I urge you to consider making the distinction between medicinal and adult-use only at the retail sale (dispensary) level. Any cultivator or manufacturer should be able to produce a product that can ultimately be sold at the retail level as either a medicinal or adult-use product. That distinction should only be made at the retail level, not at the cultivation or manufacturing level.

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 8:49:06 AM
Last Modified: Wednesday, January 31, 2018 8:58:40 AM
Time Spent: 00:09:33
IP Address: 184.63.206.61

Page 1

Q1 First Name (Optional)

Susy

Q2 Last Name (Optional)

Barsotti

Q3 Organization (Optional)

Long Valley Events

Q4 Title (Optional)

Producer

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

We've been producing festivals at Black Oak Ranch for nearly 3 decades, with the support of all significant county agencies, and want to host cannabis events. Current regs are for fairgrounds only. We want the opportunity to be licensed for these events.

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 12:40:56 PM
Last Modified: Wednesday, January 31, 2018 12:44:30 PM
Time Spent: 00:03:33
IP Address: 75.150.232.109

Page 1

Q1 First Name (Optional)

Jordan

Q2 Last Name (Optional)

Zoot, CPA

Q3 Organization (Optional)

aBIZinaBOX Inc. Cannabis Practice Group

Q4 Title (Optional)

Managing Director - CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

We discovered, that at least for now, CA Cannabis Agencies Don't Recognize Representatives in the licensing process. We believe this raises very serious concerns that may rise to the level of a due process issue. "We are a firm of certified public accountants, licensed by California Board of Accountancy [Firm #xxx8, the undersigned CPA as #xxxx47]. We represent a number of individuals and business entities which have applied for numerous licenses and permits under the commercial cannabis regulatory structure.

The first question relates to us as certified public accountants or attorneys that have been engaged to represent individuals or businesses in engaging with a regulatory agency in a context that will require discussion or engagement involving "sensitive personal or financial information with respect to an applicant/licensee.

The Internal Revenue Service ["IRS"], for example, maintains centralized Power of Attorney files [using their Form 2848] and issues individual representative identifying numbers to qualified practitioners [a CAF, for example, my CAF is 2005-xxxxxR]. Individual tax return preparers are also required to obtain a Preparer Tax Identification Number ["PTIN"]."

Please apprise us with respect to what your current procedures are for representation of individuals or business entities by attorneys and certified public accountants [let's limit the discussion to those licensed to practice in California].

The answer we received from CDPH – Manufactured Cannabis Safety Branch is as follows:

I can address the procedures and future plans for the Manufactured Cannabis Safety Branch. I'll let the Bureau and CDFA weigh in with responses from their particular offices.

The California Business and Professions Code, in section 26001(c), defines a cannabis license "applicant" as "an owner applying for a state license pursuant to this division." If the member of your firm who is completing the application for the business is considered and disclosed as an owner, they may complete the application on behalf of the business. Because of this definition in state law, I do not anticipate any immediate changes to our system to allow a representative (non-owner) to complete the application.

Some may not understand the implications of the response, however, the idea that an applicant or a business is precluded from representation by a CPA or attorney is ABSURD. I can't get fingerprinted for an owner, but we should be able to represent a business before a regulatory agency.

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 12:44:36 PM
Last Modified: Wednesday, January 31, 2018 12:44:42 PM
Time Spent: 00:00:06
IP Address: 75.150.232.109

Page 1

Q1 First Name (Optional)

Jordan

Q2 Last Name (Optional)

Zoot, CPA

Q3 Organization (Optional)

aBIZinaBOX Inc. Cannabis Practice Group

Q4 Title (Optional)

Managing Director - CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

We discovered, that at least for now, CA Cannabis Agencies Don't Recognize Representatives in the licensing process. We believe this raises very serious concerns that may rise to the level of a due process issue. "We are a firm of certified public accountants, licensed by California Board of Accountancy [Firm #xxx8, the undersigned CPA as #xxxx47]. We represent a number of individuals and business entities which have applied for numerous licenses and permits under the commercial cannabis regulatory structure.

The first question relates to us as certified public accountants or attorneys that have been engaged to represent individuals or businesses in engaging with a regulatory agency in a context that will require discussion or engagement involving "sensitive personal or financial information with respect to an applicant/licensee.

The Internal Revenue Service ["IRS"], for example, maintains centralized Power of Attorney files [using their Form 2848] and issues individual representative identifying numbers to qualified practitioners [a CAF, for example, my CAF is 2005-xxxxxR]. Individual tax return preparers are also required to obtain a Preparer Tax Identification Number ["PTIN"]."

Please apprise us with respect to what your current procedures are for representation of individuals or business entities by attorneys and certified public accountants [let's limit the discussion to those licensed to practice in California].

The answer we received from CDPH – Manufactured Cannabis Safety Branch is as follows:

I can address the procedures and future plans for the Manufactured Cannabis Safety Branch. I'll let the Bureau and CDFA weigh in with responses from their particular offices.

The California Business and Professions Code, in section 26001(c), defines a cannabis license "applicant" as "an owner applying for a state license pursuant to this division." If the member of your firm who is completing the application for the business is considered and disclosed as an owner, they may complete the application on behalf of the business. Because of this definition in state law, I do not anticipate any immediate changes to our system to allow a representative (non-owner) to complete the application.

Some may not understand the implications of the response, however, the idea that an applicant or a business is precluded from representation by a CPA or attorney is ABSURD. I can't get fingerprinted for an owner, but we should be able to represent a business before a regulatory agency.

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 01, 2018 11:17:27 AM
Last Modified: Thursday, February 01, 2018 11:24:14 AM
Time Spent: 00:06:47
IP Address: 98.190.215.82

Page 1

Q1 First Name (Optional)

William

Q2 Last Name (Optional)

Harris

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

I strongly believe that in order to combat the illegal grey market for cannabis the taxation and licensing process needs to be simplified. More licenses will challenge the grey market by making legal, regulated cannabis more accessible to consumers. By making taxes too heavy on all stages of the cannabis lifecycle(growing, distributing, sale), will open a window for illegal cannabis to continue to flourish by being cost friendly to the end consumer. The worst thing this committee could do for legal cannabis is to stop issuing legitimate licenses to businesses trying to follow the rules.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, February 02, 2018 5:20:10 PM
Last Modified: Friday, February 02, 2018 5:27:42 PM
Time Spent: 00:07:31
IP Address: 71.84.6.117

Page 1

Q1 First Name (Optional)

Cyndee

Q2 Last Name (Optional)

Smolik

Q3 Organization (Optional)

Best Buds Solutions

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

As a consultant, I need to be able to have my own online account and then submit my clients information and apply for licenses online on their behalf. Some owners don't have time to create an account for each person. Mimic the TTB's permits online system. It works well.

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 12:43:54 PM
Last Modified: Monday, February 05, 2018 12:44:38 PM
Time Spent: 00:00:44
IP Address: 50.250.197.190

Page 1

Q1 First Name (Optional)

Nancy

Q2 Last Name (Optional)

Belli

Q3 Organization (Optional)

Cannabis Consultant

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

One of the biggest issues that still needs to be further refined in the State regulations is cannabis waste. Cannabis waste is a problematic waste stream and needs to be properly addressed at all levels as this waste is highly desirable and can be harmful if someone obtains it in the wrong hands. We are seeing that current cannabis operator's trash receptacles are being raided by the homeless and children. As a result, the State Regulations need to provide further detail on proper cannabis waste management is crucial so there are no social and health impacts. The reality is that operators will not manage the cannabis waste themselves by rendering it neutralized (unrecognizable and unusable) per the State regulations. This is because many operators do not have the space or means to render the cannabis waste, and throwing it in the trash receptacles is non-compliant per State Regulations.

Existing trash companies are not going to solve the problem of trash receptacles being raided. The State Regulations should be updated to require all cannabis waste be handled by a third party cannabis licensed waste management company to handle all waste (similar to a standard trash service). Additionally, this cannabis waste management company MUST have the appropriate cannabis licenses to conduct the business such as a cannabis distribution license and cannabis manufacturing license (the State should create a new license type called a "cannabis processing license" that will allow the rendering of cannabis product into cannabis waste). The distribution license will allow the cannabis waste management company to pick up the untreated cannabis since it is still considered cannabis product, and the manufacturing (processing) license will allow the waste management company to render the cannabis product into neutralized cannabis waste. These licenses not only make the cannabis waste management company compliant, but also helps with the track and tracing of all stages of the cannabis product. This will help solve the issue of trash receptacles being raided.

The State Regulations should create a new license type of cannabis waste management companies. Additionally, the State Regulations should be updated to require all cannabis operators either hire a third party cannabis license waste management company to handle cannabis waste, or require the operator to hire a third party consultant to verify their waste is being properly rendered to show to the State. These requirements will make State Enforcement more efficient as the State Enforcement Agency can simply request proof of a third party cannabis waste management company, or third party verification that waste was properly handled. This will avoid any loopholes in which the cannabis product goes undetected and if no documentation can be provided, then the State Enforcement Agency knows the operator is not compliantly handling their waste.

#10

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 2:09:47 PM
Last Modified: Monday, February 05, 2018 2:10:07 PM
Time Spent: 00:00:19
IP Address: 66.215.116.116

Page 1

Q1 First Name (Optional)

Brad

Q2 Last Name (Optional)

Schultz

Q3 Organization (Optional)

Coastal Dance and Music Academy

Q4 Title (Optional)

Emergency Cannabis Regulation - 5026 600 FT Radius Youth Centers

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

1. The City of Grover Beach, CA issued a land use permit on 1/22/18 to Natural Healing Center, LLC that is in violation of the Emergency Cannabis Regulation, section § 5026 (a) Premises Location, which states, “(a) A premises licensed under this division shall not be located within a 600-foot radius of a school providing instruction in kindergarten or any grades 1 through 12, day care center, or youth center that is in existence at the time the license is issued.
 2. We are classified as a youth center under the following definition provided by the HEALTH AND SAFETY CODE - HSC DIVISION 10. “Youth center” means any public or private facility that is primarily used to host recreational or social activities for minors, including, but not limited to, private youth membership organizations or clubs, social service teenage club facilities, video arcades, or similar amusement park facilities.
 3. Natural Healing Center’s cannabis industry (growth, manufacture, and distribuion) will be within 150 feet of our youth center that holds dance classes and theater classes as well as rehearsals for our non-profit youth performances for preschool through age 18. We will be sharing the same parking lot!
 4. The Cityof Grover Beach’s ordinance related to this matter is silent on a set back or radius for youth centers and childcare facilities. It only stipulates a 600-foot radius from K - 12 schools, therefore the California State Emergency Regulation 5026 (a) is in effect and protects the children that participate in our dance and theater classes.
 4. Natural Healing Center’s next step is to apply for a state license which we will appose and hope that it will be denied based on the arguments listed above.
 5. We feel the Emergency Cannabis Regulation 5026 is rendered meaningless when local governments can alter the regulation. The spirit and intent is to protect the health and safety of our youth before, during after school the school day!
-

#11

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 8:47:08 PM
Last Modified: Monday, February 05, 2018 8:50:14 PM
Time Spent: 00:03:05
IP Address: 12.231.150.35

Page 1

Q1 First Name (Optional)

Marc

Q2 Last Name (Optional)

Whitlow

Q3 Organization (Optional)

Colabrativ, Inc.

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Chapter 1. All Bureau Licensees - Article 3. Licensing
§ 5014. Fees

Section 5014. Fees (c) states the following:

(c) In determining the appropriate license fee to be charged, each applicant or licensee shall estimate the maximum dollar value of its planned operation in terms of the value of the product expected to be tested, distributed, transported, retailed, cultivated and/or manufactured as determined in assessing the 15% excise tax pursuant to Revenue and Taxation Code section 34011. The applicant or licensee will use the maximum dollar value of its planned operation to determine the appropriate fee as outlined in the following fee schedule.

In slide 15 of Lori Ajax's presentation on Bureau Licensing Fees at the first meeting of the Cannabis Advisory Committee on November 16, 2017 it states the amount of license fee is "scaled based on the maximum dollar value of the licensee's operation." The annual license fee within each license type in the section 5014 has large fee steps. This result in a wide variation in the fee per dollar of operations. The current schedule unfairly burdens smaller businesses and businesses that are just over an operations limit.

It would be simpler to use a rate, such as 0.001 for a Distributor, and have the business decided what their maximum operation dollars will be. Some constraint would have to be added such as minimum operations amount, and maybe standard increment, such as million dollars.

#12

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 8:50:30 PM
Last Modified: Monday, February 05, 2018 8:52:33 PM
Time Spent: 00:02:02
IP Address: 12.231.150.35

Page 1

Q1 First Name (Optional)

Marc

Q2 Last Name (Optional)

Whitlow

Q3 Organization (Optional)

Colabrativ, Inc.

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Chapter 1. All Bureau Licensees - Article 3. Licensing

§ 5015. Payment of Fees

Section 5015. Payment of Fees (c) states the following:

(c) If the Bureau determines that the licensee paid an amount less than the appropriate licensing fee under section 5014 of this division, the licensee will be required to pay the balance of the appropriate fee and a penalty fee of 50 percent of the appropriate licensing fee. Failure to pay the appropriate fee is grounds for disciplinary action.

There should be a way for a licensed, commercial cannabis business to avoid paying “the penalty fee of 50 percent of the appropriate licensing fee”, if the business becomes aware that they will surpass the Operations limit they initially paid for. I would recommend that a subsection be added to Section 5015 that reads:

If a licensee determines that they paid an amount less than the appropriate licensing fee under section 5014 of this division, due to unexpected growth in licensee operations, then the licensee can notify Bureau and pay the difference between that of the appropriate fee and what the licensee paid prior to the dollar value of their operation exceeding the maximum dollar amount of their license.

#13

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 9:58:19 PM
Last Modified: Monday, February 05, 2018 9:58:52 PM
Time Spent: 00:00:33
IP Address: 184.184.240.2

Page 1

Q1 First Name (Optional)

Stephanie

Q2 Last Name (Optional)

Hopper

Q3 Organization (Optional)

Canndescent

Q4 Title (Optional)

Government Affairs

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

1. Owner information should be considered private information for those who own less than 20%. Cannabis is still seen as a high-risk category in the finance industry. The regulated cannabis industry does have high barriers to entry due to high licensing fees. It is hard to attract investors who are able to invest. Then willing to put other assets at risk due to cannabis being a schedule one drug. If their personal information was protected, it would reduce the risk of investment into the regulated cannabis industry by giving them anonymity and protecting their other assets.
 2. Bond requirements should be removed. There are not enough vendors willing to provide bonds to the cannabis industry to make this a viable requirement. The State of Colorado originally required bonds and was able to remove the requirement due to not experiencing issues with licensees paying taxes. In addition, \$5,000 is not a lot of money. If the State of California needs assurance,
 3. Physical Modification of Premises reduce cost from \$500 to \$50, encourage people to file changes. If the cost of modifications is too high, people will modify their premise without filing the appropriate paperwork.
-

#14

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 7:32:36 AM
Last Modified: Tuesday, February 06, 2018 7:35:21 AM
Time Spent: 00:02:45
IP Address: 12.231.150.35

Page 1

Q1 First Name (Optional)

Marc

Q2 Last Name (Optional)

Whitlow

Q3 Organization (Optional)

Colabrativ, Inc.

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Chapter 1. All Bureau Licensees - Article 3. Licensing

§ 5023. Notification of Changes

Section 5023. Notification of Changes (a) states:

(a) Every licensee shall notify the Bureau in writing within 10 business days of any change to any item listed in the application, with the exception of a change to standard operating procedures. The notification shall be signed by an owner as defined in section 5003 of this division.

The problem with this approach is that the action is taken after the business has made the change. If a commercial cannabis business notifies the Bureau after a change that would require a new license, such as a change of ownership, then the business would likely be operating illegally, and it would be subject to disciplinary proceeding.

I would recommend that a new subsection be added prior to section 5023.a that reads:

A licensee may submit to the Bureau in writing a proposed license amendment to the license application originally submitted. The notification shall be signed by an owner as defined in section 5003 of this division.

The proposed license amendment form shall contain the following:

- (1) The name of the licensee. For licensees who are individuals, the applicant shall provide both the first and last name of the individual. For licensees who are business entities, the licensee shall provide the legal business name of the applicant.
 - (2) The license number and expiration date.
 - (3) The licensee's address of record and premises address.
 - (4) The proposed changes to the license.
 - (5) An attestation that all other information provided to the Bureau in the original application under section 5002 of this division or subsequent notification under this section and section 5024 of this division is accurate and current.
 - (6) A limited waiver of sovereign immunity pursuant to section 5009 of this division.
-

#15

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 7:36:36 AM
Last Modified: Tuesday, February 06, 2018 7:37:41 AM
Time Spent: 00:01:05
IP Address: 12.231.150.35

Page 1

Q1 First Name (Optional)

Marc

Q2 Last Name (Optional)

Whitlow

Q3 Organization (Optional)

Colabrativ, Inc.

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Chapter 1. All Bureau Licensees - Article 3. Licensing
§ 5027. Physical Modification of Premises

I would recommend that a licensee that is planning a modification of its premises submit to the Bureau as part of section 5027 (c) the following:

(3) A copy of the plans they submitted to the local planning commission or the reasons that such local approval is not required, sighting the relevant local building code.

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 7:37:54 AM
Last Modified: Tuesday, February 06, 2018 7:40:48 AM
Time Spent: 00:02:53
IP Address: 12.231.150.35

Page 1

Q1 First Name (Optional)

Marc

Q2 Last Name (Optional)

Whitlow

Q3 Organization (Optional)

Colabratriv, Inc.

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Chapter 1. All Bureau Licensees - Article 3. Licensing
§ 5034. Significant Discrepancy in Inventory

Section 5034. Significant Discrepancy in Inventory (a) states:

A significant discrepancy in inventory means a difference in actual inventory compared to records pertaining to inventory of at least \$5,000 or 2 percent of the average monthly sales of the licensee, whichever is less.

This section works fine for all commercial cannabis business, except testing laboratories, which are not required to know the value of the samples they are analyzing. Laboratories keep track of the cannabis they are testing and consume during the testing in the track and trace system, and can inventory the samples they retain for 45 days, but it's such a small amount (less than 1% of the batch they sampled), that I would recommend that laboratories be exempt from this requirement.

I would recommend that a subsection added to section 5034 that would read:

Licensees that do not have an inventory of cannabis or cannabis products destined for retail sales are exempt from determining their Significant Discrepancy in Inventory.

#17

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 9:24:48 AM
Last Modified: Tuesday, February 06, 2018 9:25:26 AM
Time Spent: 00:00:37
IP Address: 107.3.149.212

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

- Discount 1st year businesses on state permit fees

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:15:42 AM
Last Modified: Tuesday, February 06, 2018 11:21:11 AM
Time Spent: 00:05:28
IP Address: 50.250.197.190

Page 1

Q1 First Name (Optional)

Brian

Q2 Last Name (Optional)

Kahn

Q3 Organization (Optional)

Cannabis Operator

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

The regulations need to be updated to properly address who is able to properly manage all the cannabis waste that will be created. More specifically, the regulations need to ensure that if a cannabis operator is going to utilize a third party cannabis waste management company, the cannabis waste management company must obtain the proper cannabis licenses to transport and render the cannabis waste. Any random person or existing trash company CANNOT handle cannabis waste. This cannabis waste management company MUST have the appropriate cannabis licenses such as a cannabis distribution license and cannabis manufacturing license (processing license). Since the product that will be picked up is untreated cannabis product (un-rendered cannabis product), the movement of the cannabis requires a distribution license. The distribution license will allow the cannabis waste management company to pick up the untreated cannabis since it is still considered cannabis product, and the manufacturing (processing) license will allow the waste management company to render the cannabis product into neutralized cannabis waste. These licenses not only make the cannabis waste management company compliant, but also help with the track and tracing of all stages of the cannabis product through Metrc since all cannabis license holders need to use the track and trace system. The proposed changes will guarantee that all cannabis waste is being handled by cannabis-permitted companies that have extensive working knowledge in the industry. These changes will ensure that all cannabis waste streams are properly identified and documented through the State's Track and Trace System, and ensure all cannabis operators are working compliantly together.

#19

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 2:22:44 PM
Last Modified: Tuesday, February 06, 2018 2:24:45 PM
Time Spent: 00:02:01
IP Address: 73.93.155.175

Page 1

Q1 First Name (Optional)

Megumi

Q2 Last Name (Optional)

Reagan

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

To Whom It May Concern:

I'm writing you to express concern over cannabis waste regulations. Cannabis waste comes in innumerable forms. I've found that the layman generally associates cannabis waste with leaves, stalks, stems, and other plant and soil byproducts. However, it's important to note that cannabis waste also includes post-extracted cannabis plants and flowers, failed lab tested materials, ancillary manufactured waste (for example, i.e., wax paper, gloves, beakers, etc.), retail display items, and returned/damaged retail items. These streams of waste come from all industry stakeholders: cultivators, manufacturers, retailers, distributors and testing labs. Handling the volume of waste produced by these stakeholders creates an ancillary industry that must be regulated.

The regulations need to be updated to reflect who is qualified to properly manage cannabis waste. The vast amounts of cannabis waste produced by the industry pose a serious risk to public health, specifically children and the disenfranchised, if not handled by properly licensed cannabis waste haulers as opposed to general waste management service providers. Third party cannabis waste management companies must obtain the proper licenses to transport and render cannabis waste. Frequently, cannabis byproduct and waste are indistinguishable from safe-to-consume materials and/or products. To mitigate these risks, limiting the exposure of the public to cannabis waste vis-a-vis safe and sustainable disposal of cannabis waste that has been tracked and traced and handled by licensed cannabis waste haulers is imperative. It will ensure that all ecosystems—the environment, the public and industry stakeholders can successfully co-exist.

Thank you.

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 2:03:29 PM
Last Modified: Tuesday, February 06, 2018 2:30:46 PM
Time Spent: 00:27:16
IP Address: 107.77.230.181

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Licensing Application Subcommittee

Q6 Feedback for Subcommittee

To whom this may concern,

I strongly recommend increasing the plant counts for medical cannabis consumers who grow their own medicine at home. Depending on the skill of the Gardner the plants will vary drastically in size and yield. Also different strains of cannabis will vary in size and yield. This is being stated because only being able to have 12 immature plants or 6 flowering plants does not meet my own personal requirements for cannabis consumption. To find 6 female plants worth spending the time and money to flower takes a lot more plants than 12 immature plants. Unless you have access to proven land races then the seeds will not resemble the parent plant which means the quality of the 12 plants you're starting with will vary drastically. A small percentage of the starting plants will be worth keeping and continuing to invest time and money into to finish the life cycles and harvest the flowers for personal consumption. Provided there is no money being made there should not be a limit to how many cannabis plants can be grown in a citizen of the United state's home. The government has oppressed and killed how many people because of dark roads taken by Harry Anslinger and William Randolph Hearst? People are going to grow as many plants as they need regardless of what the United States federal government says. Cannabis is here to stay and has played and will continue to play a vital role in shaping our society. Those who partner with nature flourish. Those who antagonize nature perish. Please make the right choices and be on the right and just side of history. Everyone who is alive today will be remember as fools by those who carry the species forward. Thank you for your time and consideration.

#21

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 2:37:18 PM
Last Modified: Tuesday, February 06, 2018 2:47:33 PM
Time Spent: 00:10:15
IP Address: 75.83.98.14

Page 1

Q1 First Name (Optional)

Laura

Q2 Last Name (Optional)

Turner

Q3 Organization (Optional)

CWR SoCal

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Cannabis Advisory Committee: Subcommittee Input Survey

Q6 Feedback for Subcommittee

In reading over the proposed regulations, I wonder if there might be further clarification presented regarding:

§ 5055. Cannabis Waste Management

(a) A licensee may not sell cannabis waste.

I think there needs to be a clear definition of what cannabis waste is.

I, along with many other growers know the entire cannabis plant can be used for its medicinal properties. There are growers who will sell their stems and stalks to manufacturers, but with this new regulation, is this still the case?

When a crop is harvested, after the flowers & trim, you are left with the stalks and stems. This waste can be beneficial in extractions for tinctures, as the THC content is typically very low, but provides other beneficial cannabinoids.

MCR Labs ran a test on the THC content found in cannabis stems, (<http://mcrlabs.com/resources-post/whats-in-the-stems/>). The test concluded that though most stems tested were below 2.0 percent THC content, flowers with a high THC percentage can cause stems to have a higher THC percentage as well.

My initial thinking was, a licensee could not sell their cannabis waste, because it was being treated like hemp. However, cannabis stems and stalks can have a THC content higher than 0.3 percent, unlike industrial hemp. If a plant is entered into the track and trace program, including the stems and stalks as a commodity, along with flowers and trim, should be an easy process. They would need to be weighed and accounted for in disposal tracking anyways.

There needs to be industry-wide education on the currently existing mandatory waste recycling regulations that affect cannabis business owners right now. Most cannabis business owners that I have spoken to, have no idea that AB 1826 or AB 199 even exist. Not knowing how these two regulations can affect them, can cost business owners thousands in non-compliance fees. All because they didn't have the information, or know that it existed.

I would like to position CWR SoCal as a partner for waste compliance within the cannabis industry. Our mission is to keep the green rush green, by processing waste into nutrient-rich soil amendment, to grow food for low and no-income families in the communities CWR SoCal services.

With cities like San Diego requesting businesses to have a contract for waste recycling services for final licensing approvals, the Cannabis Waste Management component of the regulations needs more clarification and dissemination.

I offer any assistance your department can use, with regards to establishing workshops/meetings/etc., to discuss and implement waste compliance within the cannabis community. I have decided to make it my mission to #KeepTheGreenRushGreen!

Sincerely,

Laura Turner
Owner/Operator
CWR SoCal
CannabisWasteRecycling.com
Social Media: @CWRSocal
(951) 395-1816

#22

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 2:49:20 PM
Last Modified: Tuesday, February 06, 2018 2:51:57 PM
Time Spent: 00:02:36
IP Address: 107.77.165.1

Page 1

Q1 First Name (Optional)

Christopher

Q2 Last Name (Optional)

Durkee

Q3 Organization (Optional)

Mmj

Q4 Title (Optional)

Prop 215

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Wtf is going on this is bs and i cant understand the new laws

#23

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 2:52:06 PM
Last Modified: Tuesday, February 06, 2018 2:52:10 PM
Time Spent: 00:00:03
IP Address: 107.77.165.1

Page 1

Q1 First Name (Optional)

Christopher

Q2 Last Name (Optional)

Durkee

Q3 Organization (Optional)

Mmj

Q4 Title (Optional)

Prop 215

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Wtf is going on this is bs and i cant understand the new laws

#24

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 2:52:14 PM
Last Modified: Tuesday, February 06, 2018 2:52:18 PM
Time Spent: 00:00:03
IP Address: 107.77.165.1

Page 1

Q1 First Name (Optional)

Christopher

Q2 Last Name (Optional)

Durkee

Q3 Organization (Optional)

Mmj

Q4 Title (Optional)

Prop 215

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Wtf is going on this is bs and i cant understand the new laws

#25

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 5:23:34 PM
Last Modified: Tuesday, February 06, 2018 5:25:00 PM
Time Spent: 00:01:26
IP Address: 107.210.171.5

Page 1

Q1 First Name (Optional)

Chris

Q2 Last Name (Optional)

Kaeufl

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Visionary

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Respondent skipped this question

#26

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 6:43:33 PM
Last Modified: Tuesday, February 06, 2018 6:46:58 PM
Time Spent: 00:03:24
IP Address: 67.174.233.8

Page 1

Q1 First Name (Optional)

Jude

Q2 Last Name (Optional)

Thilman

Q3 Organization (Optional)

Dragonfly Wellness Center

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Allow SMALL licensees to permanently conduct business with both Adult Use and Medical licensees irrespective of which type (A or M) license is held, beyond the stated transition period defined in B&P Section 8214. This will allow for long-term business planning and increase much-needed financial stability for small entrepreneurs during this volatile period.

One license fee for small operators both in terms of mix & match cultivation styles and for micro business.

Fair protection of small businesses in the cannabis industry. For small businesses applying for both A and M licenses, including the microbusiness license, and conducting the same commercial cannabis activity at the same property (not premises), regulations should require single costs for application fees, license fees, liability insurance and bond requirements. Small cultivators and entrepreneurs shall be defined, for this purpose, as operators of less than 10,000 sq. ft. of cultivation or less than \$500,000 gross annual sales for non-cultivation licensees.

#27

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 8:32:12 PM
Last Modified: Tuesday, February 06, 2018 8:37:38 PM
Time Spent: 00:05:26
IP Address: 64.194.161.33

Page 1

Q1 First Name (Optional)

Holly

Q2 Last Name (Optional)

Carter

Q3 Organization (Optional)

Redwood Roots

Q4 Title (Optional)

CCO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Cannabis Advisory Committee: Subcommittee Input Survey

Q6 Feedback for Subcommittee

We ask to allow Bifurcation along the supply chain - allow for med/rec to overlap until the distinction becomes needed (dosing, or at retail) - why have the distinction at all at cultivation or other places without needed break in chain? Limits cultivators and manufacturers especially, but also creates overly cumbersome tracking requirements and limits on business operations and costs.

We ask for the creation A/M license, Increase fee (but less than two licenses).

We ask for guidance on who to include in the licencing application, and if there are limits on investors as to if they can own other licenses.

We have bond questions about premise, person, or permit (folks with multiple properties, or diff cultivation types on one parcel, for example)?

With cultivators with multiple growing styles (mixed light tier 1 and outdoor is a common example) on one parcel, or one license on one parcel/site with different operations, one bond can serve for all operations.

#28

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 8:42:25 PM
Last Modified: Tuesday, February 06, 2018 9:04:07 PM
Time Spent: 00:21:41
IP Address: 162.201.66.29

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Licensing Application Subcommittee

Q6 Feedback for Subcommittee

Licensing Sub-Committee

1. Remove the 25 and 50 plant count for specialty cottage outdoor and specialty outdoor license types and instead use 2500 sq ft and 5,000sq ft. The corresponding permits under mixed light allow for sq ft canopy size, outdoors should match.

#29

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 9:32:49 PM
Last Modified: Tuesday, February 06, 2018 9:34:08 PM
Time Spent: 00:01:19
IP Address: 216.7.78.65

Page 1

Q1 First Name (Optional)

Linnet

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Remove the 4 acre cap for co-op

#30

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 9:34:14 PM
Last Modified: Tuesday, February 06, 2018 9:34:20 PM
Time Spent: 00:00:06
IP Address: 216.7.78.65

Page 1

Q1 First Name (Optional)

Linnet

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

Remove the 4 acre cap for co-op

#31

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:07:58 PM
Last Modified: Tuesday, February 06, 2018 11:08:21 PM
Time Spent: 00:00:23
IP Address: 173.228.119.237

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Licensing Application Subcommittee

Q6 Feedback for Subcommittee

None of the licensing workshops actually help prepare you for applying.

#32

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:23:29 PM
Last Modified: Tuesday, February 06, 2018 11:28:20 PM
Time Spent: 00:04:50
IP Address: 107.203.111.113

Page 1

Q1 First Name (Optional)

Margaret

Q2 Last Name (Optional)

McNames Dillehay

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

**Licensing Application
Subcommittee**

Q6 Feedback for Subcommittee

I suggest that no bond be required for Cottage growers because they grow only 25 plants and the bond is too much for most.